#### **REMARKS**

Claims 1-26 are pending in this application. Reconsideration is requested based on the following remarks.

## **Interview Summary**

The Applicants submit the following summary of the Office interview that took place November 23, 2005 between the undersigned representative of the Applicants and the Examiner.

#### Office Conference:

The Applicant thanks the Examiner for the many courtesies extended to the undersigned representative of the Applicant during the telephone interview that took place November 23, 2005.

Among the issues discussed during that interview were the patentability of the claims over the cited references.

## **Response to Arguments:**

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive, and must continue to insist that the keyword in Montalbano is not extracted from the *contents* of the registering home page, nor is it used to create a title, but rather indicates merely the location of the MDB.

The keyword of Montalbano, in particular, refers to the location information of the multimedia data to be registered as the bookmark. The keyword is used to locate icons, such as those displayed on the left side of screen 70 in Fig. 6, as described at column 8, lines 35-50.

The claimed invention, on the other hand, generates a character string from data that is extracted as a keyword. The claimed invention uses this character string as a bookmark, as described in the specification at page 14, lines 20-34, and as shown in Fig. 7. Thus, in the claimed invention, the title that is added to the registering home page is a character string, which is based on a summary and keywords from the *contents* of the home page. Therefore, when the user inspects the registered home page again, the user can easily understand the contents of the registered home page from the title, which was added to the registered home page.

The Office Action, on the other hand, asserts at page 10 that "Montalbano discloses a new title of the web page created from the keywords (column 7, line 55- column 8, line 11, claims 1-2: Here the MBD file is either graphic data, video data, audio data, or text data). The title added to the user bookmark list." This is submitted to be incorrect. The Office Action appears to be equating the MBD file to a title, and then maintaining that the MBD file, as a title, is created from extracted keywords. As Montalbano, rather, describes in the Summary at column 5, lines 18-32,

In accordance with the present invention, a keyword is embedded in an HTML document that has a URL. The keyword signals the presence of data in the HTML file that describes the location of multimedia bookmark description (MBD)information.

Thus, the keyword merely *points* to data that describes the *location* of the MBD information. No coherent title *could* be created from this keyword, since it is only a pointer.

Furthermore, as described in the Summary of Montalbano at column 5, lines 41-50,

The browser first loads and displays the HTML file containing the keyword and MBD location data. When the user directs the browser to save the location of the file as a bookmark, the browser scans the HTML file for the keyword and TITLE information. If the browser finds the keyword, it determines the location of the MBD information and stores the MBD information with the URL of the HTML file as a bookmark. If the browser cannot find the keyword, it stores the TITLE information along with the file's URL as a traditional bookmark.

Thus, if the browser *finds* the keyword it looks to where the keyword *points* for the MBD information, and stores that as a *bookmark*, not a title. Only if the browser cannot find the MBD information does it even *store* the title, and then it stores it as a traditional bookmark, not as a title either. Montalbano never *creates* anything from the keyword, let alone a title. The keyword, rather, is simply used as a pointer.

Finally, the Office Action cites Montalbano at column 7, line 55-column 8, line 11 as supporting the notion that a new title is created from the extracted keyword. As described at column 8, lines 1-9, however,

"The browser scans the HTML file 41 for the KEYWORD. If the KEYWORD is not found 42, the browser stores TITLE information and the URL in a traditional, text-only bookmark 43, and then returns the user to the browser. If the KEYWORD is found 44, then the browser downloads and stores the MBD information and the URL as a multimedia bookmark."

Here again, the browser is only storing a bookmark, traditional or MDB, not creating a

title at all. The claimed invention is thus submitted to be patentable over Montalbano. Further reconsideration is thus requested.

# Claim Rejections - 35 U.S.C. § 102:

Claims 1, 8, 12, 13, 14, 18, and 19 were rejected under 35 U.S.C. § 102(b) as anticipated by European Patent Application EP 0 833 258 to Montalbano et al. (hereinafter "Montalbano"). The rejection is traversed.

Claim 1 recites.

"a keyword extracting section configured to automatically analyze contents of a registering home page."

Montalbano neither teaches, discloses, nor suggests "a keyword extracting section configured to automatically analyze contents of a registering home page," as recited in claim 1. In Montalbano, rather, the browser scans the HTML file for the keyword in *response* to a bookmark request by the user, not automatically. In particular, as described column 5, lines 42-45,

"When the user directs the browser to save the location of the file as a bookmark, the browser scans the HTML file for the keyword and TITLE information."

Since, in Montalbano, the browser scans the HTML file for the keyword in response to a bookmark request by the user, Montalbano shows no "keyword extracting section configured to automatically analyze contents of a registering home page," as recited in claim 1.

Furthermore, in Montalbano, the browser scans the HTML file for the keyword when the *user* makes a bookmark request, rather than automatically. In particular, as described column 7, lines 9-13.

"When the user makes a bookmark request, the browser scans the HTML file for the KEYWORD, and then considers the ensuing string of non-space ASCII characters until the end of the comment line (not including the final ")") to be the MBD location data."

Since, in Montalbano, the browser scans the HTML file for the keyword when the user makes a bookmark request, Montalbano shows no "keyword extracting section configured to automatically analyze contents of a registering home page," as recited in claim 1.

Finally, in Montalbano, the browser scans the HTML file for the keyword when the *user* makes a bookmark request, rather than automatically. In particular, as described column 7, lines

9-13,

"When the user makes a bookmark request, the browser scans the HTML file for the KEYWORD, and then considers the ensuing string of non-space ASCII characters until the end of the comment line (not including the final ")") to be the MBD location data."

Since, in Montalbano, the browser scans the HTML file for the keyword when the user makes a bookmark request, Montalbano shows no "keyword extracting section configured to automatically analyze contents of a registering home page," as recited in claim 1.

Claim 1 recites further,

"a title adding section configured to automatically create a new title of the registering home page from the extracted keywords."

Montalbano neither teaches, discloses, nor suggests "a title adding section configured to automatically create a new title of the registering home page from the extracted keywords," as recited in claim 1. The Office Action cites lines 5-12 the Abstract of Montalbano as supporting the notion that a new title is created from the extracted keyword because, "even though the MBD file existed before, it is a new title because it was not previously considered a title before."

As described in the Abstract, however, at lines 10 and 11, "the browser stores the MBD file with the URL as a multimedia *bookmark*," not a title. This is to be contrasted with claim 1, which recites, "a title adding section configured to automatically create a new title of the registering home page from the extracted keywords."

Montalbano, rather, *stores* either the MBD information with the URL of the HTML file as a bookmark, or the title information along with the file's URL as a traditional *bookmark*, not creates a title at all. In particular, as described at column 5, lines 45-50,

"If the browser finds the keyword, it determines the location of the MBD information and stores the MBD information with the URL of the HTML file as a bookmark. If the browser cannot find the keyword, it stores the TITLE information along with the file's URL as a traditional bookmark."

Since Montalbano stores either the MBD information with the URL of the HTML file as a bookmark, or the title information along with the file's URL as a traditional bookmark, Montalbano shows no "title adding section configured to automatically create a new title of the registering home page from the extracted keywords," as recited in claim 1.

Furthermore, in Montalbano, the MBD information is downloaded by the browser and

stored with the URL of the HTML file as a multimedia bookmark, not created as a title at all. In particular, as described at column 7, lines 13-15,

"The MBD information is downloaded by the browser and stored with the URL of the HTML file as a multimedia bookmark."

Since Montalbano downloads the MBD information and stores it with the URL of the HTML file as a multimedia bookmark, Montalbano shows no "title adding section configured to automatically create a new title of the registering home page from the extracted keywords," as recited in claim 1.

Furthermore, in Montalbano, the MBD file and the URL are *stored* as a multimedia *bookmark*, not created as a title at all. In particular, as described at column 7, lines 28-32,

"The MBD file and the URL are then stored as a multimedia bookmark in such a way that the multimedia bookmark need not downloaded again for each new browser session."

Since Montalbano stores the MBD file and the URL as a multimedia bookmark, Montalbano shows no "title adding section configured to automatically create a new title of the registering home page from the extracted keywords," as recited in claim 1.

Furthermore, in Montalbano, the keyword signals the *presence* of data in the HTML file that describes the location of a multimedia bookmark data (MBD) information. No coherent title *could* be created from a keyword that only signals the *presence* of data. In particular, as described at column 6, lines 54-58,

"The keyword signals the presence of data in the HTML file that describes the location of a multimedia bookmark data (MBD) information. This location data is disposed in a predetermined position relative to location of the keyword in the HTML file.

Since the keyword signals the presence of data in the HTML file that describes the location of a MBD information, Montalbano shows no "title adding section configured to automatically create a new title of the registering home page from the extracted keywords," as recited in claim 1.

Finally, in Montalbano, the MBD information itself, to which the Office Action analogizes the title recited in claim 1, is not even *contained* in the HTML document. That is why Montalbano needs the keyword to signal the presence of data in the HTML file that *describes* the location of MBD information. If the MBD information is not contained in the HTML document, it cannot be

extracted from the HTML document, let alone used to create a title. In particular, as described at column 7, lines 1-5,

"The MBD information is generally stored on the same computer as the HTML document in which its location is embedded, but can also be stored on one or more networked computers or hosts to which the user has access."

Since the MBD information is not contained in the HTML document, Montalbano shows no "title adding section configured to automatically create a new title of the registering home page from the extracted keywords," as recited in claim 1.

Finally, claim 1 recites,

"configured to automatically add the title to the user's bookmark registration of the registering home page."

Montalbano neither teaches, discloses, nor suggests "configured to automatically add the title to the user's bookmark registration of the registering home page," as recited in claim 1. Montalbano, rather, creates no title at all, as discussed above. Since Montalbano creates no title, Montalbano has no title to add. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

#### Claim 8:

Claim 8 recites,

"automatically analyze contents of a registering home page."

Montalbano neither teaches, discloses, nor suggests "automatically analyze contents of a registering home page," as discussed above with respect to the rejection of claim 1.

Claim 8 recites further,

"automatically create a new title of the registering home page from the extracted keywords."

Montalbano neither teaches, discloses, nor suggests "automatically create a new title of the registering home page from the extracted keywords," as discussed above with respect to the rejection of claim 1.

Claim 8 recites further.

"automatically add the title to the user's bookmark registration of the registering home

page."

Montalbano neither teaches, discloses, nor suggests "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Claim 8 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 8 is earnestly solicited.

## Claim 12:

Claim 12 recites,

"automatically analyze contents of a registering home page."

Montalbano neither teaches, discloses, nor suggests "automatically analyze contents of a registering home page," as discussed above with respect to the rejection of claim 1.

Claim 12 recites further.

"automatically create new title information of the home page using the extracted keywords."

Montalbano neither teaches, discloses, nor suggests "automatically create new title information of the home page using the extracted keywords," as discussed above with respect to the rejection of claim 1. Claim 12 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 12 is earnestly solicited.

#### Claim 13:

Claim 13 recites.

"automatically analyzing contents of a registering home page."

Montalbano neither teaches, discloses, nor suggests "automatically analyzing contents of a registering home page," as discussed above with respect to the rejection of claim 1.

Claim 13 recites further,

"automatically creating new title information of the home page using the extracted keywords."

Montalbano neither teaches, discloses, nor suggests "automatically creating new title

information of the home page using the extracted keywords," as discussed above with respect to the rejection of claim 1. Claim 13 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 13 is earnestly solicited.

#### Claim 14:

Claim 14 recites,

"automatically analyzing contents of a registering home page."

Montalbano neither teaches, discloses, nor suggests "automatically analyzing contents of a registering home page," as discussed above with respect to the rejection of claim 1.

Claim 14 recites further,

"automatically creating a new title of the registering home page from the extracted keywords."

Montalbano neither teaches, discloses, nor suggests "automatically creating new title information of the home page using the extracted keywords," as discussed above with respect to the rejection of claim 1.

Finally, claim 14 recites,

"automatically adding the title to the user's bookmark registration of the registering home page."

Montalbano neither teaches, discloses, nor suggests "automatically adding the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Claim 14 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 14 is earnestly solicited.

#### **Claim 18:**

Claim 18 recites,

"automatically analyzing contents of a registering home page."

Montalbano neither teaches, discloses, nor suggests "automatically analyzing contents of a registering home page," as discussed above with respect to the rejection of claim 1.

Claim 18 recites further.

"automatically creating new title information of the home page using the extracted keywords."

Montalbano neither teaches, discloses, nor suggests "automatically creating new title information of the home page using the extracted keywords," as discussed above with respect to the rejection of claim 1. Claim 18 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 18 is earnestly solicited.

## Claim 19:

Claim 19 recites,

"automatically extracting keywords from the contents of the page."

Montalbano neither teaches, discloses, nor suggests "automatically extracting keywords from the contents of the page," as discussed above with respect to the rejection of claim 1.

Claim 19 recites further.

"using the keywords to create a new bookmark registration for the page."

Montalbano neither teaches, discloses, nor suggests "using the keywords to create a new bookmark registration for the page" automatically, as discussed above with respect to the rejection of claim 1. Claim 19 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 19 is earnestly solicited.

## Claim Rejections - 35 U.S.C. § 103:

Claims 2, 9, and 15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Montalbano in view of U.S. Patent No. 6,184,886 to Bates et al. (hereinafter "Bates"). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 2, 9, and 15 depend from claims 1, 8, and 14, respectively, and add additional distinguishing elements. Montalbano neither teaches, discloses, nor suggests, inter alia "automatically analyze contents of a registering home page," "automatically create a new title of the registering home page from the extracted keywords," or "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to

the rejection of claim 1. Bates does not either, and thus cannot make up for the deficiencies of Montalbano with respect to claims 2, 9, and 15. Thus, even if Montalbano and Bates were combined, as proposed in the Office Action, the claimed invention would not result. Claims 2, 9, and 15 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2, 9, and 15 is earnestly solicited.

## Claims 3, 10, and 16:

Claims 3, 10, and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Montalbano in view of U.S. Patent No. 6,631,496 to Li <u>et al.</u> (hereinafter "Li"). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 3, 10, and 16 depend from claims 1, 8, and 14, respectively, and add additional distinguishing elements. Montalbano neither teaches, discloses, nor suggests, inter alia "automatically analyze contents of a registering home page," "automatically create a new title of the registering home page from the extracted keywords," or "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Li does not either, and thus cannot make up for the deficiencies of Montalbano with respect to claims 3, 10, and 16. Thus, even if Montalbano and Li were combined, as proposed in the Office Action, the claimed invention would not result. Claims 3, 10, and 16 are thus also submitted to be allowable. Withdrawal of the rejection of claims 3, 10, and 16 is earnestly solicited.

# Claims 4, 11, and 17:

Claims 4, 11, and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Montalbano in view of U.S. Patent No. 6,415,278 to Sweet et al. (hereinafter "Sweet"). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 4, 11, and 17 depend from claims 1, 8, and 14, respectively, and add additional distinguishing elements. Montalbano neither teaches, discloses, nor suggests, inter alia "automatically analyze contents of a registering home page," "automatically create a new title of the registering home page from the extracted keywords," or "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Sweet does not either, and thus cannot make up for the deficiencies of Montalbano with respect to claims 4, 11, and 17. Thus, even if Montalbano and Sweet were combined, as proposed in the Office Action, the claimed invention would not result. Claims 4,

11, and 17 are thus also submitted to be allowable. Withdrawal of the rejection of claims 4, 11, and 17 is earnestly solicited.

#### Claim 5:

Claim 5 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Montalbano in view of U.S. Patent No. 6,211,878 to Cheng et al. (hereinafter "Cheng"). The rejection is traversed. Reconsideration is earnestly solicited.

Claim 5 depends from claim 1 and adds additional distinguishing elements. Montalbano neither teaches, discloses, nor suggests, inter alia "automatically analyze contents of a registering home page," "automatically create a new title of the registering home page from the extracted keywords," or "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Cheng does not either, and thus cannot make up for the deficiencies of Montalbano with respect to claim 5. Thus, even if Montalbano and Cheng were combined, as proposed in the Office Action, the claimed invention would not result. Claim 5 is thus also submitted to be allowable. Withdrawal of the rejection of claim 5 is earnestly solicited.

#### Claims 6 and 20-26:

Claims 6 and 20-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Montalbano in view of U.S. Patent No. 6,499,029 to Kurapati <u>et al.</u> (hereinafter "Kurapati"). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 6 and 20-26 depend from claims 1, 8, 12, 13, 14, 18, and 19, respectively, and add additional distinguishing elements. Montalbano neither teaches, discloses, nor suggests, inter alia "automatically analyze contents of a registering home page," "automatically create a new title of the registering home page from the extracted keywords," or "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Kurapati does not either, and thus cannot make up for the deficiencies of Montalbano with respect to claims 6 and 20-26. Thus, even if Montalbano and Kurapati were combined, as proposed in the Office Action, the claimed invention would not result. Claims 6 and 20-26 are thus also submitted to be allowable. Withdrawal of the rejection of claims 6 and 20-26 is earnestly solicited.

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# Claim 7:

Claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Montalbano in view of U.S. Patent No. 6,591,278 to Ernst (hereinafter "Ernst"). The rejection is traversed. Reconsideration is earnestly solicited.

Claim 7 depends from claim 1 and adds additional distinguishing elements. Montalbano neither teaches, discloses, nor suggests, inter alia "automatically analyze contents of a registering home page," "automatically create a new title of the registering home page from the extracted keywords," or "automatically add the title to the user's bookmark registration of the registering home page," as discussed above with respect to the rejection of claim 1. Ernst does not either, and thus cannot make up for the deficiencies of Montalbano with respect to claim 7. Thus, even if Montalbano and Ernst were combined, as proposed in the Office Action, the claimed invention would not result. Claim 7 is thus also submitted to be allowable. Withdrawal of the rejection of claim 7 is earnestly solicited.

#### Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-26 are allowable over the cited references. Allowance of all claims 1-26 and of this entire application is therefore respectfully requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

STAAS & HALSEY

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